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January 29, 2025

**VIA ECF**

Hon. Therese Wiley Dancks  
U.S. Magistrate Judge  
United States District Court  
for the Northern District of New York  
100 S. Clinton Street  
Syracuse, NY 13261

**Re: *Ceceleta Maitland v. State University of New York System; Upstate Medical Center; University Radiology Associates, LLP and David Feiglin, (NYND) 21-CV-00475 (MAD-TWD)***

Dear Judge Dancks:

In accordance with the Court's January 27, 2025 order, please accept this letter as a request for a conference with the Court and for permission to re-file the previously filed motion for withdrawal as counsel in this action. This request is made pursuant to Local Rule 5.3(a), Local Rule 7.1(a)(2) and Local Rule 11.1(b), and in accordance with the Court's instructions in its January 27, 2025 order. I have not yet refiled the motion, as the Court instructed, but instead intend to file the same motion papers as previously filed and now under seal by the Court's order if the Court grants the permission sought by this letter.

Pursuant to Local Rule 5.3(b), I respectfully ask that, if the Court grants this request for permission to file these motion papers, the Court authorizes that the motion and supporting papers are to be filed under seal on grounds that, as the Court observed in its January 27, 2025 order, the motion papers contain information that can be construed as privileged. Regarding my communications with opposing counsel—as required under Local Rule 7.1(a)(2) and by the Court's January 27, 2025 order—I am reporting here the result of those communications. Peter McDaniel, Esq., Assistant Attorney General, stated that he does not take a position as to this motion, but does not object. Todd Pinsky, Esq. stated that he has no objection to my motion to withdraw as counsel.

With respect to the notice issue under Local Rule 11.1(b), I would note for the Court that I did transmit the previously filed motion papers to my client by email in advance of filing so that my client would have advance notice of the motion and I also communicated with Dr. Maitland by telephone and email regarding these matters. Of course, I neglected to file an

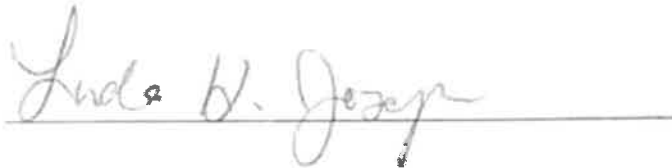
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affidavit of service to inform the Court of these actions and for that I sincerely apologize to the Court. I also apologize for overlooking the need to comply with Local Rule 7.10(a)(2). If this request for permission to file the motion and supporting papers is granted, I will comply with the requirements of Local Rule 5.3(b) necessitating prior notice to my client. Specifically, I will again provide notice to my client by email and mail and will file an affidavit of service along with the other motion papers.

In summary, I apologize for my errors and respectfully request that my requests set forth in this letter be granted by the Court.

Respectfully submitted,

**SCHRODER, JOSEPH & ASSOCIATES, LLP**

A handwritten signature in cursive script, reading "Linda H. Joseph", is written over a horizontal line.

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Peter McDaniels, Esq. (via ECF)  
Todd Pinsky, Esq. (via ECF)